

PL485  
9/2/2014  
2:13-cv-00193

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF MARIO Z. GARCIA**

I, Mario Z. Garcia, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Dimmit County, Texas.
3. I am employed by Dimmit County, where I serve as the County Clerk. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Dimmit County Clerk's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Dimmit County does not currently have an operational driver license office.

6. My office is located at 103 N. 5<sup>th</sup> Street, Carrizo Springs, Texas 78834. It is open Monday through Friday, from 8:00 am to 4:30 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of three complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Dimmit County Clerk's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 30<sup>th</sup> day of April 2014.

  
Mario Z. Garcia

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF ANA M. BAZAN**

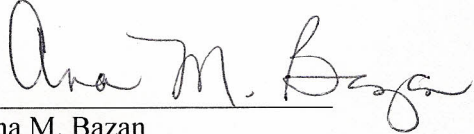
I, Ana M. Bazan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Duval County, Texas.
3. I am employed by Duval County, where I serve as the Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Duval County Elections Administrator's office.
4. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
5. Duval County does not have an operational driver license office.

6. My office is located at 400 E. Gravis, 2<sup>nd</sup> floor, San Diego, Texas 78384. It is open Monday through Friday, from 8:00 am to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of eight complete EIC applications, after which a temporary 30 day EIC receipt card was issued. Each applicant may have been issued a permanent EIC following final review by the Texas Department of Public Safety.
8. Between the dates of June 25, 2013, to the present, my office received one incomplete or otherwise incorrect EIC application.
9. The Duval County Elections Administrator's office does not currently have plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 19<sup>th</sup> day of May 2014.

  
Ana M. Bazan

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)



TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF DAVID ORTIZ**

I, David Ortiz, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Edwards County, Texas.
3. I am employed with the Edwards County Sheriff's office, where I serve as a dispatcher and temporary jailer. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Edwards County Sheriff's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.



5. Edwards County does not currently have an operational driver license office.
6. My office is located at 404 W. Austin Street, Rocksprings, Texas 78880. It is open Monday through Friday, from 8:00 am to 4:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Edwards County Sheriff's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 5 day of <sup>May</sup>~~April~~ 2014.

  
\_\_\_\_\_  
David Ortiz

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF DINA BELL**

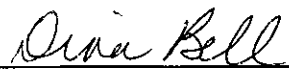
I, Dina Bell, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Fayette County, Texas.
3. I am employed by Fayette County, where I serve as the Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Fayette County Election Administrator's office.
4. The Fayette County Election Administrator's office first became available to accept and process EIC applications on October 9, 2013. I received the training and equipment for issuing EICs from the Texas Department of Public Safety on that date.

5. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
6. Fayette County does not have an operational driver license office.
7. My office is located at 151 N. Washington Street, Room 108, La Grange, Texas 78945.  
It is open Monday through Friday, from 8:00 am to 5:00 pm.
8. Between the dates of October 9, 2013, to the present, my office received a total of one complete EIC application.
9. Between the dates of October 9, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
10. The Fayette County Election Administrator's office does not currently have plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 13<sup>th</sup> day of May 2014.

  
\_\_\_\_\_  
Dina Bell

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF RICKY JONES**

I, Ricky Jones, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Franklin County, Texas.
3. I am employed by Franklin County, where I serve as the Sheriff. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Franklin County Sheriff's office.
4. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
5. Franklin County does not have an operational driver license office.

6. My office is located at 208 Texas Highway 37, Mount Vernon, Texas 75457. It is open Tuesday through Thursday, from 8:00 am to 4:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. The Franklin County Sheriff's office is under no obligation to continue accepting applications for EICs.
10. The Franklin County Sheriff's office does not currently have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 19 day of May 2014.

  
Ricky Jones



# Plaintiff Exhibit PL490

# WITHDRAWN

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF REBECCA DUFF**

I, Rebecca Duff, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Grimes County, Texas.
3. I am employed by Grimes County, where I serve as the Voter Registrar and Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Grimes County Elections office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.

5. Grimes County does not currently have an operational driver license office.
6. My office is located at 100 Main Street, Anderson, Texas 77830. It is open Monday through Friday, from 8:00 am to 4:30 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of three complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Grimes County Elections Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 28 day of April 2014.



  
Rebecca Duff

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

Civil Action No. 2:13-cv-263 (NGR)

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF TERESA ALTMAN**

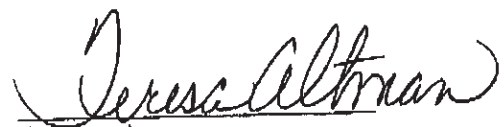
I, Teresa Altman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Hall County, Texas.
3. I am employed by Hall County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Hall County Tax Assessor-Collector's office.
4. I was appointed Tax Assessor-Collector on January 1, 2014.
5. I have no knowledge of Hall County's practices related to EICs prior to January 1, 2014.

6. My office first became available to accept and process EIC applications sometime before January 1, 2014, but I do not know the specific date. My office possessed equipment necessary to accept and process EIC applications at the time of my appointment.
7. I received training from the Texas Department of Public Safety regarding how to accept and process EIC applications on February 12, 2014.
8. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
9. Hall County does not have an operational driver license office.
10. My office is located at 512 W. Main Street, Suite 5, Memphis, Texas 79245. It is open Monday through Friday, from 8:30 am to noon, and from 1:00 pm to 5:00 pm.
11. Between the dates of January 1, 2014, to the present, my office received a total of zero complete EIC applications.
12. Between the dates of January 1, 2014, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
13. The Hall County Tax Assessor-Collector's office does not currently have plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 15<sup>th</sup> day of May 2014.

  
Teresa Altman



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF LINDA CUMMINGS**

I, Linda Cummings, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Hansford County, Texas.
3. I am employed by Hansford County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Hansford County Tax Assessor-Collector's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Hansford County does not currently have an operational driver license office.

6. My office is located at 14 Northwest Court, Spearman, Texas 79081. It is open Monday through Friday, from 8:00 am to 4:45 pm; the office receives EIC applications between 8:00 am and noon.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of eight incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Hansford County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 29 day of April 2014.

  
Linda Cummings

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF JOYCE GRAY**

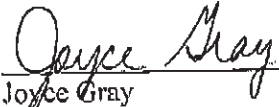
I, Joyce Gray, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Irion County, Texas.
3. I am employed by Irion County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Irion County Tax Assessor-Collector's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Irion County does not currently have an operational driver license office.

6. My office is located at 209 N. Parkview, Mertzon, Texas 76941. It is open Monday through Friday, from 8:00 am to noon, and from 1:15 pm to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Irion County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 5th day of May ~~April~~ 2014.

  
\_\_\_\_\_  
Joyce Gray

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

Civil Action No. 2:13-cv-263 (NGR)

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.



TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF BARBARA WILLIAMS**

I, Barbara Williams, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Jackson County, Texas.
3. I am employed by Jackson County, where I serve as the County Clerk. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Jackson County Clerk's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Jackson County does not currently have an operational driver license office.

6. My office is located at 115 West Main Street Room 101, Edna, Texas 77957. It is open Monday through Friday, from 8:00 am to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Jackson County Clerk's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 22 day of April 2014.

  
\_\_\_\_\_  
Barbara Williams

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

Civil Action No. 2:13-cv-263 (NGR)

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF NORMA L. HINOJOSA**

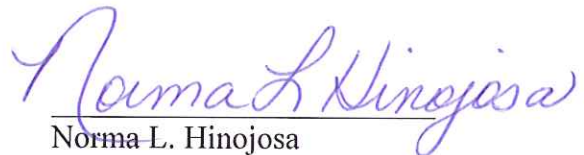
I, Norma L. Hinojosa, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Jim Hogg County, Texas.
3. I am employed by Jim Hogg County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Jim Hogg County Tax Assessor-Collector's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Jim Hogg County does not currently have an operational driver license office.

6. My office is located at 205 E. Tilley, Hebbbronville, Texas 78361. It is open Monday through Friday, from 9:00 am to noon, and 1:00 pm to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of seven complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Jim Hogg County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 25<sup>th</sup> day of April 2014.

  
Norma L. Hinojosa

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF KAREN L. OPIELA**

I, Karen L. Opiela, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

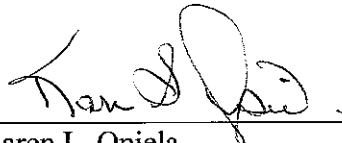
1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Wilson County, Texas.
3. I am employed with the Karnes County Elections Office, where I serve as the Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Karnes County Elections Office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.

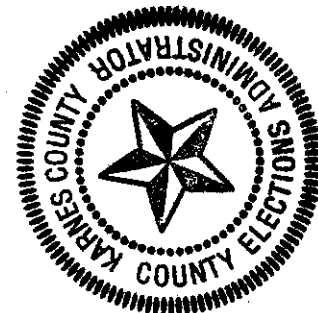


5. Karnes County does not currently have an operational driver license office.
6. My office is located at 210 W. Calvert Street, Suite 140, Karnes City, Texas 78118. It is open Monday through Thursday, from 9:00 am to 4:00 pm, and on Friday from 9:00 am to noon.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Karnes County Elections Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 22nd day of April 2014.

  
Karen L. Opiela



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF WILLIAM D. SCOGIN**

I, William D. Scogin, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Kent County, Texas.
3. I am employed by Kent County, where I serve as the Sheriff and Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Kent County Sheriff and Tax Assessor-Collector's office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.

5. Kent County does not currently have an operational driver license office.
6. My office is located at 227 S. Main, Jayton, Texas 79528. It is open Monday through Friday, from 8:00 am to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Kent County Sheriff and Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 21<sup>st</sup> day of April 2014.

  
William D. Scogin

DL-14C (Sept 2013)

**APPLICATION FOR TEXAS ELECTION IDENTIFICATION CERTIFICATE**

FOR ELECTION PURPOSES ONLY; CANNOT BE USED AS AN IDENTIFICATION CARD

**FOR DEPARTMENT USE  
ONLY**

ASSIGNED # \_\_\_\_\_

NOTICE: All information on this application must be completed in INK.

**APPLICANT INFORMATION**

LAST NAME: \_\_\_\_\_

FIRST NAME: \_\_\_\_\_

MIDDLE NAME: \_\_\_\_\_

SUFFIX: \_\_\_\_\_

MAIDEN NAME: \_\_\_\_\_

**CONTACT INFORMATION**

HOME PHONE: \_\_\_\_\_

OTHER PHONE: \_\_\_\_\_

EMAIL: \_\_\_\_\_

**ADDRESS INFORMATION**

RESIDENCE ADDRESS: \_\_\_\_\_

DATE OF BIRTH (mm/dd/yyyy): \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

SSN: \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

SEX: (Circle One) Male Female

EYE COLOR: \_\_\_\_\_ HAIR COLOR: \_\_\_\_\_

RACE/ETHNICITY: \_\_\_\_\_ (I) American Indian/Alaska Native

(A) Asian/Pacific Islander (B) Black (H) Hispanic (O) Other (W) White

HEIGHT: ft. \_\_\_\_\_ in. \_\_\_\_\_

WEIGHT: lbs. \_\_\_\_\_

UNITED STATES CITIZEN: yes \_\_\_\_\_ no \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_

ZIP CODE: \_\_\_\_\_ COUNTY: \_\_\_\_\_

MAILING ADDRESS: \_\_\_\_\_

CITY: \_\_\_\_\_ STATE: \_\_\_\_\_

ZIP CODE: \_\_\_\_\_ COUNTY: \_\_\_\_\_

If you are not a US citizen, you are not eligible for an Election Identification Certificate.

PLACE OF BIRTH: CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: \_\_\_\_\_ COUNTRY: \_\_\_\_\_

FATHER'S LAST NAME: \_\_\_\_\_ MOTHER'S MAIDEN NAME: \_\_\_\_\_

**INFORMATION REQUIRED FROM ALL APPLICANTS:**

- |    | YES                      | NO                       |   |
|----|--------------------------|--------------------------|---|
| 1. | <input type="checkbox"/> | <input type="checkbox"/> | Are you presenting a voter registration card today?   |
| 2. | <input type="checkbox"/> | <input type="checkbox"/> | If not, are you registering to vote?  |
| 3. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a Texas driver license or learner license (unexpired, or expired for no more than 60 days)?                       |
| 4. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a Texas identification card (unexpired, or expired for no more than 60 days)?                                     |
| 5. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a Texas concealed handgun license (unexpired, or expired for no more than 60 days)?                               |
| 6. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a US passport (unexpired, or expired for no more than 60 days)?   |
| 7. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a US citizenship certificate that contains your photograph?   |
| 8. | <input type="checkbox"/> | <input type="checkbox"/> | Do you have a US military identification card that contains your photograph (unexpired, or expired for no more than 60 days)? |

If answering "yes" to questions 3 through 8, you are not eligible to receive a Texas Election Identification Certificate.

**CERTIFICATION**

I do solemnly swear, affirm, or certify that I am the person named herein and that the statements on this application are true and correct.

X \_\_\_\_\_

Date: \_\_\_\_\_

**VERIFICATION**

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

\_\_\_\_\_  
Notary Public in and for the State of Texas or Authorized Officer

FRONT

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF JAMMYE D. TIMMONS**

I, Jammye D. Timmons, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of King County, Texas.
3. I am employed with King County, where I serve as the County Clerk. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the King County Clerk.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. King County does not currently have an operational driver license office.

6. My office is located at the County Courthouse, 800 S. Baker St., Guthrie, Texas 79236.  
It is open Monday through Friday, from 9:00 am to noon, and 1:00 pm to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the King County Clerk's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 17th day of April 2014.

  
Jammie D. Timmons



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF MARGARITA A. ESQUEDA**


I, Margarita A. Esqueda, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of La Salle County, Texas.
3. I am employed by La Salle County, where I serve as the County and District Clerk. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the County and District Clerk's office, along with Dora A. Gonzalez, the La Salle County Tax Assessor.
4. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.

5. La Salle County does not have an operational driver license office.
6. My office is located at 101 Courthouse Square, Cotulla, Texas 78014. My office can issue EICs on two Tuesdays within 30 days of each election, from 9:00 am to noon and from 1:00 pm to 3:00 pm. Our office also plans to issue EICs from the Encinal Veterans Hall, located on 105 Bonanza Street, Encinal, Texas 78019, on two Thursdays within 30 days of each election, from 10:00 am to 2:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of two complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of one incomplete or otherwise incorrect EIC application.
9. The La Salle County and District Clerk's office does not currently have plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 7<sup>th</sup> day of May 2014.

  
Margarita A. Esqueda  
La Salle County & District Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

Civil Action No. 2:13-cv-263 (NGR)

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF KATHY FRY**

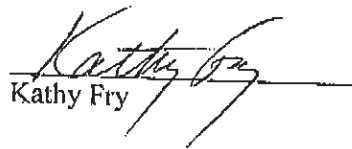
I, Kathy Fry, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Lipscomb County, Texas.
3. I am employed with the Lipscomb County Tax Office, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Lipscomb County Tax Office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Lipscomb County does not currently have an operational driver license office.

6. My office is located at 101 S. Main Ave., Lipscomb, Texas 79056. It is open Monday through Friday, from 8:30 am to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Lipscomb County Tax Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 15 day of April 2014.

  
Kathy Fry

PL502  
9/2/2014  
2:13-cv-00193

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF TINA POWERS**

I, Tina Powers, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Loving County, Texas.
3. I am employed by the Loving County Sheriff's Office, where I serve as an administrative assistant. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Loving County Sheriff's Office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Loving County does not currently have an operational driver license office.



6. My office is located at 114 West Collins Avenue, Mentone, Texas 79754. It is open Monday through Friday, from 8:00 am to noon, and 1:00 pm to 4:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Loving County Sheriff's Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 22nd day of April 2014.

  
Tina Powers

CIVIL RIGHTS DIVISION  
VOTING SECTION

2014 APR 30 PM 3:15

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DECLARATION OF DONNA WILLIS**

I, Donna Willis, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
2. I am a resident of Lynn County, Texas.
3. I am employed by Lynn County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Lynn County Tax Office.
4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
5. Lynn County does not currently have an operational driver license office.

6. My office is located at 1521 Avenue J, Tahoka, Texas 79373. It is open Monday through Friday, from 8:30 am to noon, and 1:00 pm to 5:00 pm.
7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
9. To the best of my knowledge, the Lynn County Tax Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this the 30<sup>th</sup> day of April 2014.

Donna Willis  
Donna Willis